REMARKS

Summary of the Office Action

Claims 1-23 are canceled. Claims 24-35 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over U.S. Patent No. 6,895,403 to Cardwell *et al.* (*Cardwell*), in view of *Selling by Objective* (SBO), May 1984.

Summary of the Response to the Office Action

Applicants submit that the specification supports the previously presented claim amendments.

Applicants amend claims 24, 25, 30, and 31. Support for the claims amendments is found in at least [0117] to [0120] and Tables 1 and 2.

Claims 24-35 are pending for consideration.

The Specification Supports the Previously Presented Claim Amendments

The Office Action suggests that paragraphs [0079] – [0086] of the specification lack support for "each of the four axes communicating both horizontally with each of the other four axes" as recited in previously presented claims 24 and 30. Office Action at 7. Applicants respectfully disagree. For example, paragraph [0082] discloses "objectives based on the four parameters of product, territory, application (finished product), and account (customer account)" and "corporate objectives set in view of the four parameters." Paragraph [0084] discloses a "horizontally and vertically integrated management system" and paragraph [0085] discloses "a flexible management structure that is characterized by multiple inputs, mutuality, and

information sharing." For at least these reasons, Applicants submit that the specification supports the previously presented claim amendments.

All Claims Comply with 35 U.S.C. § 103(a)

Independent claims 24, 25, 30, and 31 stand rejected under 35 U.S.C. § 103(a) as allegedly unpatentable over U.S. Patent No. 6,895,403 to Cardwell *et al.* (*Cardwell*), in view of *Selling by Objective* (SBO), May 1984. Applicants respectfully disagree. They maintain their remarks from their previous traversals, and traverse these rejections for at least the following additional reasons.

Independent claims 24, 25, 30, and 31, as amended, recite in part "managing an achievement of the target by reading the said initial target and said actual performance and arbitrarily selecting any one or more from said four axes simultaneously" and "displaying a table of said initial target and/or said actual performance along the arbitrarily and simultaneously selected axis or axes on the local and/or remote terminal, wherein said initial target is ranked and sorted by value of the initial target." Support for the amendments to the claims is found in at least paragraphs [0117] to [0120] and Tables 1 and 2.

Applicants respectfully assert that *Cardwell* and SBO, alone or combined, fail to prompt a person of ordinary skill in the relevant field to combine the elements of the prior art in the way the claimed invention does in amended claims 24, 25, 30, and 31. *See KSR Int'l Co. v. Teleflex, Inc.*, 127 S. Ct. 1727, 1741 (2007). Accordingly, Applicants respectfully assert that independent claims 24, 25, 30, and 31 are allowable for at least the reasons set forth above. Moreover, Applicants respectfully submit that dependent claims 26-29 and 32-35 are allowable at least

because of their respective dependencies from independent claims 24, 25, 30, and 31, and for the reasons set above. As a result, Applicants respectfully submit that the rejections under 35 U.S.C. § 103(a) should be withdrawn.

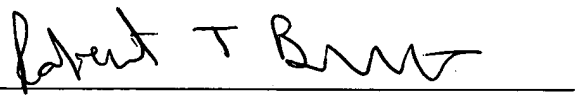
CONCLUSION

In view of the foregoing, Applicants respectfully request reconsideration and the timely allowance of the pending claims. Should the Examiner feel that there are any issues outstanding after consideration of the response, the Examiner is invited to contact the Applicants' undersigned representative to expedite prosecution. If there are any fees due in connection with the filing of this paper, please charge the fees to our Deposit Account No. 50-0310. If a fee is required for an extension of time under 37 C.F.R. § 1.136 not accounted for above, such an extension is requested and the fee should also be charged to our Deposit Account.

Respectfully submitted

MORGAN, LEWIS & BOCKIUS LLP

Dated: June 4, 2008

By: 

Robert T. Burns, Jr.
Reg. No. 60,545

Customer Number 009629
MORGAN, LEWIS & BOCKIUS LLP
1111 Pennsylvania Avenue, N.W.
Washington, DC 20004
Telephone: 202-739-3000
Facsimile: 202-739-3001